

Docket No.: 94100417(EP)USD1X1C1D6 PDDD  
Serial No.: 09/773,473

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## **REMARKS**

### **I. Status**

In the Office Action mailed September 26, 2003, the Examiner noted that claims 1-13 were pending and rejected claims 1-13. The applicant respectfully traverses the rejection.

### **II. Oath Declaration**

It is not required by the statutes or by the related rules to state a domestic priority claim in the declaration. To claim domestic priority under 35 U.S.C. 120, applicant must comply with 37 CFR 1.78 which requires, in part, that the priority claim information be in either the first line of the specification or in an application data sheet. 37 CFR 1.78 (2) (iii). The specification was amended in the Amendment of July 8, 2003 to include domestic priorities.

### **III. Foreign Priority**

A certified copy of the priority document GB 9504046.5 has been ordered and will be submitted to the U.S. Patent Office when received.

### **IV. Response to Examiner's "Response to Amendment"**

As to point (6) and (7), the Examiner stated that the Examiner does not clearly understand the Applicants' remark that Horvath et. al. makes no distinction between standard-dependent and standard-independent processing.

Claim 1 of the present invention recites "standard-dependent processing stages" and "standard-independent" processing stages. The standard-independent processing stages are capable of processing information based on the standard for that information. As explained more fully below in Applicants' response to points (8) and (9), Horvath et al. discloses an embodiment which processes a single standard (In this case JPEG). Thus, Horvath et al. does not have the capability to process a stream of information containing more than one standard as in the present invention.

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As to point (8) and (9), the Examiner points out that Horvath discloses stages to process different standards[e.g. MPEG, JPEG] [col 1, lines 33-41; and col 10, lines 17-37].

The section referred to by the Examiner is in the Background of the Invention of Horvath et al., as follows

"Image compression and decompression (CODEC) techniques, such as those referred to as the Joint Photographic Experts Group (JPEG) and the Motion Picture Experts Group (MPEG), make use of a discrete cosine transform (DCT) function. These techniques divide an image into many small areas, referred to as blocks..."

column 1, lines 33-38

The above section of the Background merely refers to the existence of different standards and is recited for Background never relating this information to any embodiment of the invention.

Therefore, the above does not disclose as recited in claim 1 of the present invention "standard-dependent processing stages capable of reconfiguration to operate in accordance with different data encoding standards" (column 1, lines 4-6).

In fact, Horvath clearly discloses a machine which operates only on a single standard. For example, Horvath et al. states:

"As was noted above, for the baseline JPEG method that is employed in the presently preferred embodiment, the Huffman coder is used to reduce the entropy of quantized DCT coefficients."

column 6, lines 24-28

Furthermore, Horvath et al. states that "[a] presently preferred DCT

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approach is one based on the Joint Photographic Experts Group (JPEG) "baseline" (column 3, lines 54-56).

These sections of Horvath et al. clearly demonstrate that a single "standard", in this case JPEG, is being processed in a preferred embodiment. This is clearly different then the present invention which can process a stream containing different standards or, alternately, multiple streams, with each stream containing a different standard. Horvath et al. does not disclose a device which has this functionality.

As to points (10) and (11), commenting on applicants' remarks that Horvath et al. does not disclose standard –dependent processing stages providing reconfiguration information.

Claim 1 of the present invention recites processing capable of "reconfiguration". One example of an embodiment of a reconfigurable processing stage is described in the specification in section 6. RECONFIGURABLE PROCESSING STAGE on page 103, line 19 to page 109, line 33. The Examiner has cited column 2, lines 19-54 of Horvath et al. for disclosing processing circuitry which is used to process blocks of data. However, Horvath et al. does not show circuitry capable of "reconfiguration" and in particular "reconfiguration" in response to a different standard. As shown above, Horvath et al. only processes the data of a single standard.

As per remarks (12) and (13), commenting on applicants' remarks that Horvath et al. does not disclose a "token" as an "interactive interfacing messenger package for control and/or data functions".

A "token" of the present invention is defined as:

"...A universal adaptation unit in the form of an interactive Interfacing messenger package for control and/or data functions."

specification, page 24b, lines 11-13

This entails a technology more powerful than a traditional token, for

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example, in the context of token rings, or a traditional packet of information. An embodiment of a token is described in section 10 TOKENS in the specification from page 120, line 30 to page 125, line 4. In contrast to the present invention, the sections of Horvath et al. disclosed by the examiner only shows "block processing" in a single standard. Horvath et al. does not disclose a "token" as defined in the specification as shown above. A token is a versatile structure having among its many capabilities, a multi-standard token, as described as follows:

"[a] multi-standard token is a way of mapping MPEG, JPEG and H.261 data streams onto a single decoder using a mixture of standard dependent and standard independent hardware and control tokens"

specification, page 121, lines 17-20

As per remarks (14) and (15), commenting on applicants' remarks that Horvath et al. does not disclose processing using "tokens" and hence does not disclose a "QUANT\_TABLE" token. Although Horvath et al. briefly mentions "internal quantization tables" (column 7, line 8), Horvath et al., as discussed above, does not disclose processing using "tokens" and hence does not disclose a "QUANT\_TABLE" token.

In conclusion, in view of the above arguments, the present invention clearly is not anticipated by Horvath et al. A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Since it has been shown that not every element of claims 1-13 is set forth in Horvath et al., the applicants' request withdrawal of the rejection and allowance of the claims.

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**V. Rejection of claims under 35 U.S.C. § 102(e)**

Claims 1-13 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Horvath et al.

To support the allegation that Horvath et al. discloses processing stages interconnected to form a pipeline as recited in claim 1, the Examiner cites to the Abstract of Horvath et al. However, in contrast to the present invention recited in claim 1 which recites to a pipeline of processing stages, Horvath et al. discloses a machine architecture for processing image blocks by the coordinated actions of primarily two processors, an LSM and CODEC processors, operating on image blocks stored in buffers.

To support the allegation that Horvath et al. discloses standard-independent stages, the Examiner cites to column 6, lines 12-14 and column 8, lines 3-24 of Horvath et al. However, column 6, lines 12-24 discloses a processor performing various steps of an algorithm, e.g. DCT, VLC. Column 8, lines 3-23 disclose the operation of a DCTQ device. Thus, neither of these sections cited by the examiner disclose "standard-independent stages" which process data independent of a standard (e.g., MPEG, JPEG). In fact, the sections cited by the Examiner, as well as the reference of Horvath et al. as a whole, make no distinction between standard-dependent and standard-dependent processing.

To support the allegation that Horvath et al. discloses standard-dependent stages, the Examiner cites to column 3, line 63 to column 4, line 12. However, this section merely discloses a DCT device producing coefficients and is unrelated to standard-dependent processing and makes no distinction between standard-dependent and standard-independent processing.

To support the allegation that Horvath et al. discloses standard-dependent processing stages capable of reconfiguration to operate in accordance with different data encoding standards, the Examiner cites to column 1, lines 33-41 and column 5, lines 15-30. However, these sections merely describe the steps of the decoding process and do not disclose "dependent processing stages" as recited in claim 1. Horvath et al. in column

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3, lines 51-62 discloses that the discrete cosine transform (DCT) is based on the JPEG standard. The disclosure of Horvath et al. and the subsequent algorithm described is that of a single standard. The machine of Horvath et al. is not designed to "operate in accordance with different data encoding standards" (claim 1, lines 5-6) as recited in the present invention.

To support the allegation that Horvath et al. discloses tokens providing reconfiguration information to the standard-dependent processing stages, the Examiner cites to column 1, lines 33-51. However these sections do not disclose standard-dependent processing stages providing reconfiguration information.

In summary Horvath et al. discloses an embodiment of a machine which decodes and encodes blocks of image data for a single standard. Consequently, the machine of Horvath et al. is not designed to "operate in accordance with different data encoding standards" (claim 1, lines 5-6) as recited in the present invention. As a result, Horvath et al. does not disclose, as recited in claim 1, standard-independent or standard-dependent processing stages. Furthermore, Horvath et al. does not disclose a reconfigurable stage.

Furthermore, the cited prior art does not disclose a "token" as recited in the claims of the present invention. A token of the present invention is defined in the specification as "interactive interfacing messenger package for control and /or data functions." This entails a technology more powerful than a traditional token, for example, in the context of token rings, or a traditional packet of information.

As to claim 2, to support the allegation that Horvath et al. discloses each of the tokens including an extension indicator that indicates whether additional words are present, the Examiner cites to column 5, lines 24-30 and column 8, lines 24-27. However these sections only refer to processing of blocks of data and do not disclose a token being a universal adoption unit in the form of an interactive interfacing messenger package for control and/or data functions.

As to claims 5-7, although Horvath et al. briefly mentions "internal quantization tables" (column 7, line 8), Horvath et al., as discussed above, does

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not disclose processing using "tokens" and hence does not disclose a "QUANT\_TABLE" token.

The Examiner rejected claims 8-13 for similar reasons as for claims 1-7. Consequently, claims 8-13 are patentable over the prior art for the same reasons as claims 1-7.

Therefore, the present invention recited in claims 1-13 is not rendered obvious by the cited prior art.

#### VI. Concluding Matters


In view of the foregoing remarks, it is respectfully submitted that each of the claims distinguishes over the prior art, and therefore, defines allowable subject matter. A prompt and favorable reconsideration of the rejection along with an indication of allowance of all the pending claims is respectfully requested.

Should there be any remaining questions to correct format matters, it is urged that the Examiner contact the undersigned attorney with a telephone interview to expedite and complete prosecution.

If any further fees are required in connection with the filing of this response, please change same to our Deposit Account No. 04-1175.

Respectfully submitted,

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